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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

AMAZON.COM, INC., a Delaware
corporation, and AMAZON TECHNOLOGIES,
INC., a Nevada corporation,

Plaintiffs,

v.

UMER WASIM, *et al.*,

Defendants.

Case No. 3:23-cv-05580-TLT

**PLAINTIFFS AMAZON.COM, INC. &
AMAZON TECHNOLOGIES, INC.'S
MOTION FOR ADMINISTRATIVE
RELIEF TO FILE OVERLENGTH
BRIEF; AND [PROPOSED] ORDER**

Complaint filed: October 30, 2023

Pursuant to Local Civil Rule 7-11, Plaintiffs Amazon.com, Inc. and Amazon Technologies, Inc. (together, “Amazon”) hereby request that the Court permit them to exceed, by 15 pages, the 25-page limit applicable to their Motion For Default Judgment Against Defendants: (1) VTLogodesign, Inc.; (2) MK Affiliates, Inc.; (3) Ali Alam; (4) Dynamic Digital Solutions LLC; (5) Mehwash Munir; (6) One Stop Computer Services LLC; (7) Muhammad Zubair Khan; (8) Techtute Inc.; (9) Muhammad Mudassar Anwar; (10) Tech Drive Pvt LLC; (11) Ashhar Rawoof; (12) Smart Startup Solutions, LLC.; (13) Muhammad Usman Khan; (14) Yasir Agar; (15) Muhammad Shiraz Qureshi; and (16) Mavia Nizam.

Under Local Civil Rule 7-2, motions for default judgment are limited to 25 pages. Amazon’s motion in this case includes significant legal and factual briefing regarding the Court’s jurisdiction over Defendants, many of whom are foreign nationals; facts supporting each of the 16 individual Defendants’ connections to the 26 websites at issue and their liability under the Lanham Act for trademark infringement and cybersquatting; the 7-factor default judgment analysis in *Eitel v. McCool*, 782 F.2d 1470, 1471-72 (9th Cir. 1986); and the rationale and reasoning underlying Amazon’s requests for damages and an injunctive relief. Declaration of Jean Fundakowski, ¶ 4. Extended briefing is necessary to fully inform the Court regarding the issues contained in the motion. *Id.* For the foregoing reasons, Amazon submits that good cause exists to file an over-length brief of 40 pages. Amazon will undertake every effort to be concise and appropriately brief. ¶ 5.

Amazon would have conferred with Defendants on this request before submitting it the Court as required by Local Rule 7-11(a), but no defaulting Defendant has appeared during this proceeding. ¶ 6.

Pursuant to Local Civil Rule 7-11(a), this Motion is accompanied by a proposed order.

1 DATED: September 4, 2024

Respectfully submitted,

DAVIS WRIGHT TREMAINE LLP

3 By: /s/Jean Fundakowski

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